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5  
6 UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

7 UNITED STATES OF AMERICA, )  
8 Plaintiff, ) NO: CR-11-6087-LRS-2  
9 v. )  
10 ) **MOTION FOR TEMPORARY  
11 ) DETENTION AND DETENTION  
12 ) HEARING**  
13 )  
14 YOLANDA CALVO-ROBLES, )  
15 )  
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28 )  
Defendant. )  
\_\_\_\_\_  
The United States moves for the detention of Yolanda Calvo-  
Robles, for a period of not more than ten days, excluding  
Saturdays, Sundays, and holidays, pursuant to 18 U.S.C. § 3142(d).  
1. This case is eligible for such a detention order because  
the case involves (check all that apply):  
\_\_\_\_\_  
Defendant on release, pending trial, etc., (18 U.S.C.  
§ 3142(d)(1)(A)).  
\_\_\_\_\_  
 Defendant not a citizen or lawful permanent resident  
(18 U.S.C. § 3142(d)(1)(B)).  
AND  
\_\_\_\_\_  
 Defendant may flee.  
\_\_\_\_\_  
Defendant may pose a danger to any other person or the  
community.  
The United States further moves for pretrial detention of  
defendant, pursuant to 18 U.S.C. § 3142(e) and (f) and moves for a  
detention hearing within the foregoing ten-day period.

1       1. Eligibility of Case. This case is eligible for a  
2 detention order because case involves (check all that apply):

3       \_\_\_\_ Crime of violence (18 U.S.C. § 3156)  
4       \_\_\_\_ Maximum sentence life imprisonment or death  
5       \_\_\_\_ 10+ year drug offense  
6       \_\_\_\_ Felony, with two prior convictions in above categories  
7       \_\_\_\_ X Serious risk defendant will flee  
8       \_\_\_\_ Serious risk obstruction of justice

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10       2. Reason for Detention. The court should detain defendant  
11 because there are no conditions of release which will reasonably  
12 assure (check one or both):

13       \_\_\_\_ X Defendant's appearance as required  
14       \_\_\_\_ Safety of any other person and the community

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16       3. Rebuttable Presumption. The United States will not  
17 invoke the rebuttable presumption against defendant under Section  
18 3142(e). (If yes) The presumption applies because (check one or  
19 both):

20       \_\_\_\_ Probable cause to believe defendant committed 10+ year  
21            drug offense or firearms offense, 18 U.S.C. § 924(c)  
22       \_\_\_\_ Previous conviction for "eligible" offense committed  
23            while on pretrial bond

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25       4. Time for Detention Hearing. The United States requests  
26 the court conduct the detention hearing before the expiration of  
27 defendant's detention pursuant to 18 U.S.C. § 3142(d).  
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1 5. Other Matters.

2 DATED this 22nd day of December, 2011

3 MICHAEL C. ORMSBY  
4 United States Attorney

5 s/Alison L. Gregoire  
6 ALISON L. GREGOIRE  
7 Assistant United States Attorney